

MEMO ENDORSED

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March 21, 2025

VIA ECF & EMAIL

Hon. Valerie E. Caproni
United States District Judge
500 Pearl Street
New York, NY 10007

**Re: United States v. Juan Mercado
24 CR 279 (VEC)**

Dear Judge Caproni:

I, along with Akane Fujiwara, represent Juan Mercado. On January 31, 2025, Your Honor sentenced Mr. Mercado to 48 months. He is set to surrender by April 30, 2025.

Mr. Mercado respectfully requests that his bail conditions be temporarily modified to permit him to travel to visit with family in South Carolina and Virginia. He would be traveling by car, leaving New York on April 9th and returning on April 20th. He has given the exact locations of where he will be staying to Pre-Trial Officer Marnie Gerardino.

I am informed by USPO Gerardino that Pre-Trial has no objection to this application. In addition, I have been informed by AUSA Jerry Fang that the Government takes no position on this application.

Accordingly, I respectfully request that Mr. Mercado's bail conditions be temporarily modified to permit him to travel by car to Virginia and South Carolina, and all the districts between, from April 9th through April 20th.

Respectfully Requested,

/s/

Harvey Fishbein

cc: AUSA Jerry Fang (via email and ECF)
USPO Marnie Gerardino (via email)

Application GRANTED. Mr. Mercado's bail conditions are modified to permit him to drive to Virginia and South Carolina and the districts in between from April 9, 2025 to April 20, 2025. Mr. Mercado must provide probation with the addresses where he will be staying and notify probation when he returns to the Southern District of New York.

SO ORDERED.

3/21/25

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the printed name.

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE